



MURIEL GOODE-TRUFANT Acting Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT

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October 31, 2024

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BY ECF

Honorable Katherine H. Parker United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Defendants' request is GRANTED. The parties shall file the status letter by **November 18, 2024**, detailing the remaining discovery disputes, if any.

SO ORDERED:

Kathaine H Parker 11/1/2024

GREGORY ACCARINO

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UNITED STATES MAGISTRATE JUDGE

Re: Kwaine Thompson v. City of New York, et al.

22 Civ. 1458 (JPO) (KHP)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Katrese Brumfield, Jessica Simmons, Debbie Palmer-Campbell, Tiffany Francis, Chandra Davis, and Tony Montague ("defendants") in the above-referenced matter. The defendants write to respectfully request a two-week extension of time, from November 4, 2024 until November 18, 2024, for the parties to submit a joint status letter discussing "remaining discovery disputes, if any." *See* Dkt. No. 151, Order, October 28, 2024. This is defendants' first such request to extend the deadline of this status letter, and plaintiff's counsel has no objection to this request. This request does not affect any other Court deadlines.

By way of background, on October 28, 2024, the Court denied plaintiff's October 16, 2024 Motion to Compel, directing the parties to "meet and confer on several outstanding disputes before bringing them to the Court's attention." *Id.* The Court also instructed the parties to submit a joint status letter by November 4, 2024, "updating the Court on the status of the remaining discovery disputes, if any." *Id.*

On October 30, 2024, the parties met and conferred regarding several topics of discovery, and are working towards resolutions. However, I will be out of the office from November 4, 2024 until November 12, 2024 on previously scheduled leave. The defendants respectfully request this additional two-week period to account for my absence and also to allow the parties time to attempt to resolve their discovery disputes in an effort to avoid Court intervention.

Accordingly, the defendants respectfully request a two-week extension of time, from November 4, 2024 until November 18, 2024, for the parties to submit a joint status letter regarding discovery disputes, if any.

The defendants thank the Court for its consideration.

Respectfully submitted,

<u>/s/ Gregory J.O. Accarino</u> Gregory J.O. Accarino Senior Counsel Special Federal Litigation Division

cc: **By ECF**:

Sami Elamad, Esq.

Attorney for Plaintiff